

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

IN RE:  
SHERRELLE THOMAS  
Debtor ) CASE NO: 25-40919  
          ) Chapter 13  
          ) ) Trustee's Objection to Confirmation  
          ) ) Original Confirmation Hearing set for:  
          ) ) May 15, 2025 10:00 am

**TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN**

**COMES NOW** Diana S. Daugherty, Standing Chapter 13 Trustee, and for her objection to confirmation states as follows:

1. The set monthly payments to be made by the Trustee exceed the plan payment.
2. The plan does not contain enough funds to pay secured and priority creditors in full and pay the amount guaranteed to general unsecured creditors (if any). 11 U.S.C. §§ 1322(a)(2) and 1325(a)(5)(B)(ii). The approximate amount of the shortfall is \$12,000.
3. A secured claim has been filed for an unscheduled 2017 Ford Escape.

**WHEREFORE** the Trustee prays the Court enter its order denying confirmation of the proposed plan.

Dated: April 29, 2025

OBJCONF--KR

/s/ Kathy Reichbach  
Kathy Reichbach MO56957  
Attorney for Trustee  
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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was filed electronically on April 29, 2025, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

I certify that a true and correct copy of the foregoing document was filed electronically with the United States Bankruptcy Court, and has been served by Regular United States Mail Service, first class, postage fully pre-paid, addressed to those parties listed on the Court's Manual Notice List and listed below on April 29, 2025.

SHERRELLE THOMAS  
119 RODERICK DR  
SAINT LOUIS, MO 63137

/s/ Kathy Reichbach  
Kathy Reichbach MO56957